

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;
JAMISON J., by and through his next friend, Clara Lewis; AND
DESIREE, RENEE, TYSON, AND MONIQUE P.,
by and through their next friend, Sylvia Forster; on their
own behalf and on behalf of all others similarly situated

PLAINTIFFS

V.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi;
DONALD TAYLOR, as Executive Director of the Department
of Human Services; AND BILLY MANGOLD,
as Director of the Division of Family and Children's Services

DEFENDANTS

**PLAINTIFF'S MOTION FOR ADMISSION *PRO HAC VICE*
OF MARGARET ROSS**

COME NOW Plaintiffs, pursuant to Rule 83.1(A)(2) of the Uniform Local Rules of the United States District Courts for the Northern and Southern Districts of Mississippi, respectfully requesting the Court for an Order admitting Margaret Ross *pro hac vice* as additional counsel for Plaintiffs, and would show the Court the following:

1. Margaret Ross is a non-resident who is not a member of the Mississippi Bar and is not authorized to practice before the Mississippi Supreme Court.

2. Ms. Ross is with Children's Rights, Inc., located at 404 Park Avenue South New York, NY, 10016. Her telephone number is (212) 683-2210. Her facsimile number is (212) 683-4015.

3. Ms. Ross was admitted to practice law in New York in 2003, and is a member of the United States District Court for the Eastern District of New York. Ms. Ross is a member in good standing of the New York Bar. A copy of Ms. Ross's certificate of good standing for the U.S. District Court for the Eastern District of New York is attached as Exhibit A.

4. Ms. Ross is familiar with the Uniform Local Rules of the United States District Courts for the Northern and Southern Districts of Mississippi. *See* Affidavit of Margaret Ross, attached as Exhibit B.

5. Ms. Ross will be associated with Melody McAnally and W. Wayne Drinkwater, Jr. of Bradley Arant Rose & White LLP, both members in good standing with the Mississippi Bar. Their office address is Suite 450, One Jackson Place, 188 East Capitol Street, Post Office Box 1789, Jackson, Mississippi, 39215. Their telephone number is (601) 948-8000. Their facsimile number is (601) 948-3000.

WHEREFORE, Plaintiffs requests that the Court issue an Order admitting Margaret Ross, *pro hac vice*, and for such other relief as may be justified.

Respectfully submitted, this the 10th day of October, 2005.

/s Melody McAnally
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PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2005, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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s/ Melody McAnally